

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

Docket No. C99-1

**UNITED STATES POSTAL SERVICE
COMPELLED RESPONSES TO UNITED PARCEL SERVICE
INTERROGATORIES UPS/USPS-3(B)-(C), 4, AND 44
(June 18, 2001)**

In accordance with P.O. Ruling No. C99-1/22, the United States Postal Service hereby provides compelled responses to the following interrogatories of United Parcel Service: UPS/USPS—3(b)-(c), 4, and 44.

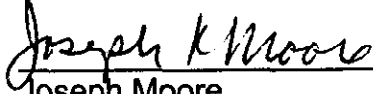
In providing these responses, the Postal Service does not intend to waive its position that the Postal Service's Motion to Dismiss this proceeding should have been granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:


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June 18, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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June 18, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-3. Of the total number of PosteCS transactions that have taken place to date, what proportion involved:

* * * * *

(b) a sender located in the United States and a recipient not located in the United States;

(c) a sender not located in the United States and a recipient located in the United States?

RESPONSE:

The Postal Service has no information responsive to this request. The Postal Service has no means of tracking the physical location of senders and recipients when they retrieve or send messages via PosteCS. Once a company or individual is authorized to use PosteCS, specific transactions can originate from or be sent to any location that has Internet access.

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

UPS/USPS-4.

(a) Provide the number of PosteCS transactions where the sender was located in the United States and the message was left for the recipient to retrieve on a server located in the United States.

(b) Provide the number of PosteCS transactions where the sender was located in the United States and the message was left for the recipient to retrieve on a server located outside the United States.

(c) Provide the number of PosteCS transactions where the sender was located outside the United States and the message was left for the recipient to retrieve on a server located in the United States.

(d) Provide the number of PosteCS transactions where the sender was located outside the United States and the message was left for the recipient to retrieve on a server located outside the United States.

Response:

See response to 3(b-c).

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

UPS/USPS-44. Through May 31, 1999, or the most recent date for which such information is available, state the percentage of the total number of PosteCS transactions by users licensed by the Postal Service that were addressed to a foreign top level domain.

RESPONSE:

As of June 18, 2001, 10:24 a.m. EST, the percentage of PosteCS transactions by users licensed by the Postal Service that were addressed to "foreign" top level domain--as defined by UPS in interrogatory UPS/USPS-47--was 2.47%.